

ORIGINAL

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June 28, 2000

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FEDERAL COMMUNICATIONS COMMISSION  
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Magalie Roman Salas, Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
12th Street Lobby, TW-A325  
Washington, DC 20554

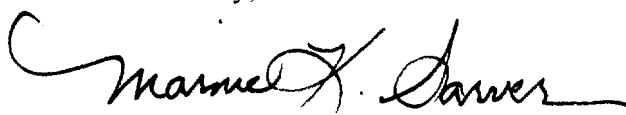
Re: DTV Channel 7, Knoxville, TN  
SUPPLEMENT TO PETITION FOR  
RULE MAKING – BPRM-20000530ABH

Dear Ms. Salas:

On behalf of Gannett Tennessee, L.P., licensee of Television Station WBIR-DT, Knoxville, Tennessee, we are submitting herewith an original and four (4) copies of a Supplement to the above-referenced Petition for Rule Making submitted December 8, 1999 to change the DTV channel allotted for use by WBIR-DT from Channel 31 to Channel 7. The supplement provides an analysis of possible conflict with prospective Class A television stations and concludes that there is no conflict.

If further information is required, please direct inquiries and correspondence to the undersigned.

Sincerely,



Marnie K. Sarver

Enclosures

No. of Copies rec'd 0+4  
List A B C D E

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20557

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In the Matter of	)	
	)	
Amendment of Section 73.622(b) of	)	MM Docket No.
the Commission's Rules, DTV	)	RM No. BPRM-20000530ABH
Table of Allotments	)	
(Knoxville, Tennessee)	)	

To: Chief, Video Services Division  
Mass Media Bureau

**SUPPLEMENT TO PETITION FOR RULEMAKING**

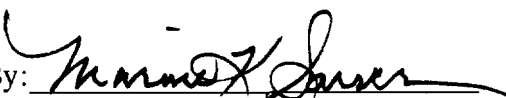
1. Gannett Tennessee, L.P. ("Gannett"), by its attorneys and pursuant to Section 73.623 of the Commission's rules, 77 C.F.R. §73.623, hereby supplements its Petition for Rulemaking ("Petition") dated December 8, 1999 seeking to amend the Table of Allotments for the digital television service ("DTV Table") to change the initial DTV channel allotment for station WBIR-DT, Knoxville, Tennessee, from channel 31 to channel 7.

2. At the request of FCC staff, Gannett has examined the impact that the proposed channel change would have on low power television stations that have been certified as eligible for licensing in the new Class A Television Service. As set forth in the attached statement of Joseph M. Davis, P.E., of Cavell, Mertz & Davis, Gannett's consulting engineers, the proposed operation of WBIR-DT on channel 7 will not have an adverse impact on any low power or television translator station that has been declared eligible for a Class A license.

3. In light of the foregoing and the information provided in the Petition, Gannett respectfully requests that the Commission commence a rulemaking proceeding to amend the DTV Table of Allotments to allot and assign DTV channel 7 (in lieu of channel 31) to Knoxville, Tennessee, for use by WBIR-DT.

Respectfully submitted,

**GANNETT TENNESSEE, L.P.**

By: 

Marnie K. Sarver

of

WILEY, REIN & FIELDING

1776 K Street, NW

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(202) 719-7000

Its Attorneys

June 28, 2000

Engineering Statement  
prepared for  
**Gannett Tennessee, L.P.**  
WBIR-DT Knoxville, Tennessee

This engineering statement has been prepared on behalf of *Gannett Georgia, L.P. (Gannett)*, licensee of station WBIR-TV, Knoxville, Tennessee. *Gannett* has filed a *Petition for Rulemaking* with the Commission (file number BPRM-20000530ABH) to change the "paired" DTV channel for WBIR-DT from Channel 31 to Channel 7. This statement provides a review of the DTV Channel 7 proposal with respect to possible conflict with prospective Class A television stations

**Discussion**

An allocation study of possible conflicts was conducted with respect to Low Power Television (LPTV) / translator stations that may be eligible for Class A status.<sup>1</sup> The study determined that the following LPTV / translator stations are close enough to *Gannett's* proposed DTV Channel 7 facility to warrant detailed review:

Channel	Call		City		State	Lat	Distance
Applicant/Licensee						Long	Bearing
=====							
7N	W07AM	LIC	Zn:	FORK MOUNTAIN, ETC.	, TN	36- 7-21	48.48
				0.01 kW	0M	84-27-29	285.72
GANNETT TENNESSEE, L.P.							
7+	W36BG	APP	Zn:	SOUTH PITTSBURG	, TN	34-58-22	191.64
				1.50 kW	0M	85-37-58	233.78
GRAPEVINE OF HUNTSVILLE LIC.SUB,LLC							
7Z	WKTP-LP	LIC	Zn:	GATE CITY, ETC.	, VA	36-38-29	143.83
				0.05 kW	0M	82-32-39	60.20
HOLSTON VALLEY BROADCASTING CORP.							
7N	W07BE	LIC	Zn:	YOUNG HARRIS	, GA	34-56-18	118.39
				0.01 kW	0M	83-55- 2	179.01
GEORGIA MOUNTAIN FAIR, INC.							
7Z	W55CR	LIC	Zn:	COLUMBUS	, GA	32-30-46	398.82
				0.06 kW	0M	84-58- 6	194.03
WORD OF GOD FELLOWSHIP, INC.							
7N	W07AH	LIC	Zn:	BARBOURVILLE	, KY	36-51-58	95.59
				0.00 kW	0M	83-54- 0	2.12
BARBOURVILLE AREA TELEVISION CORP.							
7Z	W07BY	LIC	Zn:	MOREHEAD	, KY	38-11- 3	245.50
				0.02 kW	0M	83-27-44	9.81
MCKINLEY WALKER							
8N	W08AX	LIC	Zn:	MARSHALL	, NC	35-48-15	114.29
				0.01 kW	0M	82-41-53	100.90
SPARTAN BROADCASTING COMPANY							

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<sup>1</sup>The Commission recently created a new class of television stations. See *Establishment of a Class A Television Service*, MM Docket 00-10, FCC 00-115, released April 4, 2000.

## Engineering Statement

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8N W08BJ	LIC	Zn: MARION, ETC.	, NC	35-40-15	178.65
SPARTAN BROADCASTING COMPANY		0.16 kW	0M	82- 0-20	101.42
8N W08AT	LIC	Zn: CHEROKEE, ETC.	, NC	35-28-24	81.23
SPARTAN BROADCASTING COMPANY		0.15 kW	0M	83-19-22	136.42
8N W08BF	LIC	Zn: SPRUCE PINE, ETC.	, NC	35-52-48	166.21
SPARTAN BROADCASTING COMPANY		0.12 kW	0M	82- 6-15	94.26
8N W08BT	LIC	Zn: NEWBERRY	, SC	34-16- 5	287.35
PACIFIC AND SOUTHERN COMPANY, INC.		0.07 kW	0M	81-36- 4	131.45
8Z W66DG	LIC	Zn: LOUISVILLE	, KY	38- 4-36	281.67
CELEBRATION MINISTRIES, INC.		0.04 kW	0M	85-46-10	325.24
8N W08BH	LIC	Zn: ANDREWS, ETC.	, NC	35-15-26	84.02
WYFF HEARST-ARGYLE TELEVISION, INC.		0.03 kW	0M	83-47-43	171.00
8N W08AO	LIC	Zn: CANTON, ETC.	, NC	35-34-34	104.79
SPARTAN BROADCASTING COMPANY		0.01 kW	0M	82-54-26	116.73
8N W08AN	LIC	Zn: BRYSON CITY, ETC.	, NC	35-24-47	76.79
WLOS LICENSEE, LLC		0.01 kW	0M	83-30- 2	148.71
8+ W08BP	LIC	Zn: BEAVER DAM, ETC.	, NC	35-38-59	129.91
SPARTAN BROADCASTING COMPANY		0.08 kW	0M	82-34-12	107.28

From the list above, a study was made to determine which LPTV stations' protected contours are overlapped by the corresponding interfering contour from the proposed WBIR-DT facility, using the criteria of §73.623(c)(5). With respect to interference caused from the various LPTV stations to the proposed WBIR-DT facility, an evaluation was conducted per §73.6013, which would require that an analog Class A station not cause 0.5 percent (or more) interference to a DTV facility's service population. The detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").<sup>2</sup>

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<sup>2</sup>The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein, except that the terrain profile step size is 0.1 km (which provides a finer resolution than the Commission's standard 1 km step size). A standard cell size of 2 km was used. The service area for the proposed WBIR-DT facility is that area predicted to receive signal levels of at least 36 dB $\mu$  using the Longley-Rice methodology, and within the DTV F(50,90) 36 dB $\mu$  service contour distance as determined per §73.625(b). Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

## Engineering Statement

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All of the LPTV stations under consideration that would cause any interference (including interference below 0.5 percent population) to the proposed WBIR-DT are listed below, along with any LPTV stations that would receive contour overlap from the proposed WBIR-DT. A description of how the overlap or interference does not create a conflict with Class A television is also provided below.

<u>Station</u>	<u>Channel</u>	<u>Disposition</u>
W07AM (Lic)	7	See Note 1
WKTP-LP (Lic)	7	See Notes 1, 2
W07BE (Lic)	7	See Note 1
W07AH (Lic)	7	See Note 1
W36BG (APP)	7	See Note 1

Note 1: Station is not on the Commission's June 2, 2000 list of stations deemed eligible to file an application for Class A station status, and protection is therefore not required.<sup>3</sup>

Note 2: Station is on the Commission's June 7, 2000 list of stations that are or were licensees of television translator broadcast stations during the 90-day period ending November 28, 1999. Since Class A eligibility is limited only to low power television licensees, its statement of eligibility was deemed materially deficient and dismissed.<sup>4</sup> Thus, protection is not required.

Thus, for the reasons outlined above, it is believed that the various stations listed above are not required to be protected by the proposed WBIR-DT Channel 7 facility. The Commission's interference criteria to all other LPTV stations are met. If a waiver of any Rule or policy regarding Class A stations is required, then one is respectfully requested on behalf of the applicant for the reasons stated above.

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<sup>3</sup>See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

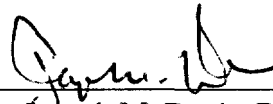
<sup>4</sup>See June 7, 2000 Public Notice *Dismissal of TV Translator Licensee Certificates of Eligibility for Class A Television Station Status*, DA 00-1227.

Engineering Statement

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**Certification**

Under the penalty of perjury, the undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Davis is a principal in the firm of *Cavell, Mertz & Davis, Inc.*, is a Registered Professional Engineer in Virginia, holds a Bachelor of Science degree from Old Dominion University in Electrical Engineering Technology, and has submitted numerous engineering exhibits to various local governmental authorities and the Federal Communications Commission. His qualifications are a matter of record with that entity.



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Joseph M. Davis, P.E.

June 23, 2000

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